REMARKS

Claims 1-36 are pending in the present application. Claims 1, 6-9, 13-16, 20, 25-28, and 32-36 were amended. Reconsideration of the claims is respectfully requested.

Amendments were made to the specification to correct errors and to clarify the specification. No new matter has been added by any of the amendments to the specification.

I.   35 U.S.C. § 112, First Paragraph

The Examiner has objected to the specification under 35 U.S.C. § 112, first paragraph, as failing to adequately teach how to make and/or use the invention in claims 1, 9, 16, 20, 28, 35, and 36. Additionally, the Examiner rejected the claims under the same reasons. This rejection is respectfully traversed. Claims 1, 9, 16, 20, 28, 35, and 36 were amended.

The Examiner rejected independent claims 1, 9, 16, 20, 28, 35, and 36 under 35 U.S.C. 112, first paragraph, arguing that "a document cannot retain its original and physical spatial characteristics after content has been made invisible, because any modifications to the document would change the physical and spatial characteristics." (*Office Action*, dated May 31, 2005, page 2).

Independent claims 1, 20, and 35 are amended to read "*unmodified content in* said *modified* document retaining its original physical and spatial characteristics after *a portion of* said *original* content is modified" instead of "said document retaining its original physical and spatial characteristics after said content is modified." (Emphasis added for additions). Independent claims 9, 16, 28, and 36 are amended to read "*unaltered content in* said *altered* web page retaining its original physical and spatial characteristics after *a portion of* said original content is altered" instead of "said web page retaining its original physical and spatial characteristics after said original content is altered." (Emphasis added for additions).

Therefore, the objection of the specification under 35 U.S.C. § 112, first paragraph has been overcome.

II.   35 U.S.C. § 112, Second Paragraph

The Examiner has rejected claims 1, 9, 16, 20, 28, 35, and 36 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter, which applicants regard as the invention. This rejection is respectfully traversed. Claims 1, 9, 16, 20, 28, 35, and 36 were amended.

The Examiner rejected independent claims 1, 9, 16, 20, 28, 35, and 36 under 35 U.S.C. 112, second paragraph, arguing that "increasing the rate at which a user reads the document is subjective, because different users read different words at different speeds." (*Office Action*, dated May 31, 2005, page 3).

Independent claims 1, 20, and 35 are amended to read *"relative to a speed at which the user can read the document without modifications."* (Emphasis added for additions). Independent claims 9, 16, 28, and 36 did not cite "increasing the increase a speed at which a user can read," but have now been amended to read *"increases a speed at which a user can read the altered web page relative to a speed at which the user can read the web page without alterations."* (Emphasis added for additions).

Therefore the rejection of claims 1, 9, 16, 20, 28, 35, and 36 under 35 U.S.C. § 112, second paragraph has been overcome.

III.   35 U.S.C. § 103, Obviousness, Claims 1-15 and 20-36

The Examiner has rejected claims 1-36 under 35 U.S.C. Section 103(a) as being anticipated by *Humes* (U.S. Patent No. 5,996,011) in view of *Walker et al.* (U.S. Patent No.6, 286,001). This rejection is respectfully traversed.

With regard to claim 1 being anticipated by *Humes* in view of *Walker*, the Examiner states:

> In regard to independent claim 1, Humes teaches *a method in a data processing system* (Humes Abstract Lines 1-3 i.e. system and method for restricting access to data received by a computer) *for modifying original content of for a document* (Humes Col 5 Line 26), *the method comprising: receiving a request for modified content* (Humes Abstract Line 3 i.e. data received)(Humes Col 5 Line 26); *and in response to each receipt of the request, modifying said original content using a set of rules by making selected content in said document invisible without degrading readability of said documents* (Humes Abstract Line 3 i.e. data received) (Humes Col 5 Line 26)(Humes Col 5 Line 26 i.e. certain rules are met);

selected content in the document is being made visible to increase a speed at which a user can read the document; (Humes Col 6 Line 37 i.e. filtered text)

Humes does not specifically mention *said document retaining its original physical and spatial characteristics after said content is modified, and displaying said document having said original physical and spatial characteristics.* However, Walker mentions a document having its original characteristics (Walker Col 3 Lines 15-21). It would have been obvious to one of ordinary skill in the art at the time the invention was made to apply Walker to Humes, providing Humes the benefit of displaying the document with its original characteristics to fit the users original display screen.

(*Office Action*, dated May 31, 2005, pages 3-4). Amended independent claim 1, which is representative of amended independent claims 9, 20, 28, 35 and 36 with regard to similarly recited subject matter, reads as follows:

1.   A method in a data processing system for modifying original content of a document, the method comprising:
  receiving a request for modified content;
  in response to each receipt of said request, *modifying said original content*, using a set of rules to make selected content in said document invisible *without degrading readability of said document to form a modified document, wherein unmodified content in said modified document retaining its original physical and spatial characteristics after a portion of said original content is modified, and wherein the selected content in the document being made invisible increases a speed at which a user can read the modified document relative to a speed at which the user can read the document without modifications*; and
  displaying said modified document having said original physical and spatial characteristics for the unmodified content. (emphasis added)

The Examiner bears the burden of establishing a prima facie case of obviousness based on prior art when rejecting claims under 35 U.S.C. § 103. *In re Fritch*, 972 F.2d 1260, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992). For an invention to be prima facie obvious, the prior art must teach or suggest all claim limitations. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). The *Humes* and *Walker* references cited by the Examiner do not render obvious the present invention as recited in independent claims 1, 16, and 29 because the references fail to teach or suggest all claim limitations.

Claim 1 recites receiving a request for modified content and modifying original content of a document without degrading readability of the document. This claim also

recite that the unmodified content in the document retains its original physical and spatial characteristics after a portion of the original content is modified to increase a speed at which a user can read the modified document. Claim 1 recites "receiving a request for modified content . . . modifying said original content . . . without degrading readability of said document to form a modified document, wherein unmodified content in said modified document retaining its original physical and spatial characteristics after a portion of said original content is modified, and wherein the selected content in the document being made invisible increases a speed at which a user can read the modified document relative to a speed at which the user can read the document without modifications." Receiving a request for modified content and modifying original content of a document without degrading readability of the document where the unmodified content in the modified document retains its original physical and spatial characteristics after a portion of the original content is modified to increase a speed at which a user can read the modified document are not features taught or suggested in *Humes* or *Walker*.

The Examiner alleges that *Humes* teaches modifying original content of a document without degrading readability of the document in the following cited sections: "The present invention provides a system and method for restricting access to data received by a computer over a network by filtering certain data from the data received." (*Humes*, Abstract, lines 1-3). "If decision block 228 returns a 'yes' (objectionable material found), then that portion of the web page is modified and, if certain rules are met, it is later sent to the client computer, indicated at block 232." (*Humes*, column 5, lines 24-27).

The cited sections above do not teach modifying original content of a document without degrading readability of the document. None of the sections of *Humes* referred to by the Examiner teaches taking into consideration the readability of the document. In fact, nothing in *Humes* teaches taking into consideration the readability of the document. The referenced sections in *Humes* teach filtering received data and modifying objectionable material found in a web page. Although *Humes* teaches modifying material in a web page, it does not teach modifying original content of a document without degrading readability of the document.

The teachings of *Humes* in regards to readability of modified documents are in the following section:

> If the page contains objectionable text, the method determines what kind of objectionable text (specific words), how much objectionable text, and the relative groupings of objectionable text. Depending on the settings of predetermined parameters, certain objectionable words (if found) are either replaced with an innocuous filler (such as "- - - " before the web page is forwarded to the user's computer, or only a "FORBIDDEN" page is forwarded to the user's computer.

Humes, column 3, lines 28-36.

Humes does not teach modifying the original content in a document without degrading readability of the document. *Humes* teaches replacing selected words and/or phrases with a filler, such as a series of dashes, without regard to the readability of the document. The only consideration in *Humes* is whether a particular word or phrase is objectionable. If that word or phrase is objectionable, that word or phrase is replaced without any consideration as to whether the replacement will affect the readability of the document. For example, if a particular word is a verb, that word will be replaced. *Humes* does not take into consideration whether the word is important to the understanding of the document. Replacing words in a sentence, such as the verb, without regard to readability of the document may result in a final document that makes no sense at all.

In addition, objectionable words are replaced regardless of the number of words that have already been replaced. For example, if a sentence contains ten words and nine of them are deemed objectionable, those nine words will be replaced by *Humes* with dashes. The result will be a single word that is displayed to the user. According to *Humes*, words will be replaced regardless of whether or not the final sentence is comprehendible. Replacing nine words in a ten-word sentence would degrade the readability of the document. *Humes* is more concerned with removing objectionable content rather than readability. *Humes* would permit such a replacement because *Humes* does not take into consideration whether the readability of the document will be degraded.

Therefore, *Humes* does not teach modifying original content of a document without degrading readability of the document.

The Examiner alleges that *Humes* teaches selected content in the document being made invisible to increase a speed at which a user can read the document in the following cited section: "This Deny List feature is advantageous inter alia for designating web pages which may contain objectionable material other than text which may be filtered, such as objectionable pictures." (*Humes*, column 6, line 37.)

The section cited above does not teach a method that "increases a speed at which a user can read." Nothing in this section of *Humes* teaches anything about the speed at which a user can read the document. The section of *Humes* cited by the Examiner teaches pre-determining a list of web pages as objectionable due to objectionable pictures, instead of objectionable text, whereby access to such an objectionable web page is denied. In fact, nothing in *Humes* teaches increasing the speed at which a user can read.

The Examiner appears to be assuming that by filtering text, a user will be able to read the document faster. However, it is very likely that the opposite will occur. By filtering content based only on whether particular words or phrases are objectionable without regard to the readability of the document, instead of the readability of the filtered document increasing, the readability of the filtered document may become more difficult resulting in a decrease in the speed at which a user can read the filtered document. If words or phrases are replaced with fillers such as dashes, it is more likely that it will take a reader a longer amount of time to read the document because the reader must struggle to determine the meaning of the document having words that are now replaced with fillers. It is easier, in an environment such as recited in claim1, to read a document when content has been made invisible and when that content was selected without degrading the readability of the document in order to increase the speed at which a user can read the modified document.

The Examiner alleges that *Humes* teaches receiving a request for modified content in the following cited sections:

> The present invention provides a system and method for restricting access to data received by a computer over a network by filtering certain data from the data received. . . If decision block 228 returns a "yes"

(objectionable material found), then that portion of the web page is modified and, if certain rules are met, it is later sent to the client computer, indicated at block 232.

Humes, Abstract, lines 1-3; column 5, lines 24-27.

The cited sections above do not teach receiving a request for modified content. None of the sections of *Humes* referred to by the Examiner teaches taking into consideration a request for modified content. In fact, nothing in *Humes* teaches taking into consideration a request for modified content. The referenced sections in *Humes* teach filtering received data and modifying objectionable material found in a web page. Although *Humes* teaches modifying material in a web page, it does not teach receiving a request for modified content.

The teachings of *Humes* in regards to receiving a request for modified content are in the following section:

> In the preferred embodiment, the request is sequentially filtered at three different levels, if necessary. First, the URL requested is filtered to determine if the web page associated with that URL has been pre-approved or pre-denied. If the URL has not be pre-approved or pre-denied, the header of the web page is then filtered to determine if the web page contains text data (such as HTML). If so, the body of the web page is filtered. While the filter will decide whether or not to block access to the entire web page based on the URL, depending on its processing of the body of the web page, *the filter may deny access completely to the web page, deny access to certain portions of the web page* (i.e., filter out some objectionable words), *or allow complete access to the web page.*

Humes, column 2, line 63, to column 3, line 9. (Emphasis added)

Humes does not teach receiving a request for modified content. *Humes* teaches a request that results in three possibilities, one of which is complete access to the web page requested. Humes receives a request for complete access to the web page, a request for content that is not modified. The filters in Humes may eventually result in a response to of filtered data, or modified content, to the request, but the request received was for complete access to the web page, not a request for modified content. Therefore, *Humes* does not teach receiving a request for modified content.

Applicants agree with the Examiner that *Humes* does not teach retaining the original physical and spatial characteristics of a document or web page after the content

of that page has been modified or altered. Applicants claim modifying the original content of a requested document by making some of the content invisible. The document is then displayed, having some of its content rendered invisible, but still keeping the document's original physical and spatial characteristics for the content that is not rendered invisible. According to *Humes*, the original physical and spatial characteristics of the page are not retained because objectionable content is removed from the page. The Examiner relies on the following section in *Walker* to teach retaining the original physical and spatial characteristics of a document or web page after the content of that page has been modified or altered:

> In the supervisor mode of operation, the browser also generates pixel signatures based on image data contained in web pages of the authorized web sites and generates checksum values based on text data contained in web pages of the authorized web sites. The browser later compares pixel signatures and checksum values from subsequently accessed web pages to the original pixel signatures and checksum values to determine if any of the data in the authorized web pages has been changed.

Walker, column 3, lines 12-21.

In the section above, *Walker* teaches generating a checksum value for a web page and then when this web page is accessed again at a later time, determining a new checksum that is compared to the original checksum. In this manner a determination can be made as to whether the later accessed page is the same as the page when it was originally accessed.

Walker does not teach retaining the original physical and spatial characteristics of a document or web page for content that is unmodified or unaltered after a portion of the content of that document or web page has been modified or altered. *Walker* teaches adding a web page to a list of permitted pages that can be accessed and generating a baseline value, such as a checksum, that is calculated using the content of the web page. At a later time if a user wants to access this page again, another value is calculated using the current content of the web page. If the baseline value and the current value are the same, the content of the web page has not changed and the page can be accessed. If the baseline value and the current value are different, the content has changed and the user will not be permitted to access the page.

Walker does not teach retaining the original physical and spatial characteristics of a document for content that is unmodified after a portion of the content of that document has been modified. *Walker* teaches comparing a document's content at a baseline time to the content of the document at the current time to determine whether the content has changed. If the content has not changed, that page is displayed. Thus, the page that is displayed by *Walker* is the original page before any content in the page was modified. If content in the page is modified, the modified page is not displayed. Therefore, *Walker* does not teach a document that retains its original physical and spatial characteristics for the content that is unmodified after a portion of the content in the document has been modified.

The Examiner further states that it would be obvious to combine *Humes* with *Walker* to arrive at the features of the claimed invention. However, *Walker* does not cure the deficiencies in *Humes*. *Walker* does not teach or suggest receiving a request for modified content or modifying original content of a document without degrading readability of the document, where the original content that is unmodified in the document retains its original physical and spatial characteristics after a portion of the original content is modified to increase readability of the document and to increase the speed at which a user can read the modified document, as recited in claim 1 of the present invention. As described above, *Humes* does not teach these features. Therefore, the combination of *Humes* and *Walker* not render claim 1 unpatentable because the combination does not describe, teach, or suggest receiving a request for modified content or modifying original content of a document without degrading readability of the document, where the original content that is unmodified in the document retains its original physical and spatial characteristics after a portion of the original content is modified to increase readability of the document and to increase the speed at which a user can read the modified document.

In contrast to the *Humes* and *Walker* inventions, the present invention, as recited in independent claim 1 teaches receiving a request for modified content and modifying original content of a document without degrading readability of the document, where the original content that is unmodified in the document retains its original physical and spatial characteristics after a portion of the original content is modified to increase

readability of the document and to increase the speed at which a user can read the modified document. *Humes* and *Walker* do not teach these features. Therefore, *Humes* and *Walker* fail to teach all elements of the claimed invention, and thus fails to anticipate the invention as recited in independent claim 1.

Even if *Humes* were combinable with *Walker*, the result of such a combination would not be the invention as recited in independent claim 1. Rather, such an alleged combination would result in a system for filtering objectionable material in a web page, as taught in *Humes*, with a browser supervised to access only authorized web sites, in the manner described by *Walker*. Even with the additions of *Humes* and *Walker*, there would be no receiving a request for modified content nor modifying original content of a document without degrading readability of the document, where the original content that is unmodified in the document retains its original physical and spatial characteristics after a portion of the original content is modified to increase readability of the document and to increase the speed at which a user can read the modified document, as recited in claim 1 of the present invention.

Furthermore, one of ordinary skill in the art would not combine *Humes* with *Walker* when each reference is considered as a whole. In considering a reference as a whole, one of ordinary skill in the art would take into account the problems recognized and solved. As discussed in the Abstract, *Humes* is directed towards filtering material in a web page that is received from the Internet. The user receives only a portion of a filtered web page with objectionable material. Objectionable material is filtered from the page before the page is displayed. If the requested page contains a large amount of objectionable material, a "forbidden" page is displayed instead of the web page. In summary, *Humes* provides a method for filtering objectionable material in a web page, and when a user requests a web page with objectionable material, the user receives only a portion of a filtered web page with objectionable material, or no web page at all.

In contrast, according to the abstract, *Walker* is directed towards a browser capable of accessing only web pages previously authorized by a parent or supervisor of a user of the browser. In a supervisor mode of operation, a parent can browse through any accessible web site and continually add approved web sites to a database of authorized web sites. Later, in a user mode of operation, the child is capable of accessing only those

web sites that have been added to the authorized web site database. In the supervisor mode of operation, the browser also generates pixel signatures based on image data contained in web pages of the authorized web sites and generates checksum values based on text data contained in web pages of the authorized web sites. The browser later compares pixel signatures and checksum values from subsequently accessed web pages to the original pixel signatures and checksum values to determine if any of the data in the authorized web pages has been changed. In summary, *Walker* provides for a browser supervised to access only authorized web sites.

In view of the above, there is no motivation to combine the teachings of *Humes* with *Walker* in the manner alleged by the Examiner. The Examiner alleges that the motivation for the alleged combination is to provide "Humes the benefit of displaying the document with the original characteristics to fit the users original display screen." However, there is no suggestion in *Humes* that there is a need for fitting documents to display screens. In fact, *Humes* is directed toward a user receiving only a portion of a filtered web page with objectionable material, or no web page at all. Although the screens in *Humes* display documents, there is never any mention of fitting a document with its original characteristics to the users original display screen. There is no need, let alone any suggestion, for fitting a document to a screen in *Humes*.

Moreover, there is no suggestion in *Walker* of a need to combine the browser supervised to access only authorized web sites approach of *Walker* with the filtering objectionable material in a web page approach, such as that taught by *Humes*. *Humes* has nothing to do with a supervisor programming a browser to allow access only authorized web sites. There is no need, let alone any suggestion in *Walker* for filtering objectionable text on a web page. Thus, the alleged motivation offered by the Examiner is not based on the actual teaching of the references.

As noted above, there is no teaching or suggestion in the references as to the desirability of including the features from other references. The mere fact that a prior art reference can be readily modified does not make the modification obvious unless the prior art suggested the desirability of the modification. *In re Laskowski*, 871 F.2d 115, 10 U.S.P.Q.2d 1397 (Fed. Cir. 1989) and also *see In re Fritch*, 972 F.2d 1260, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992) and *In re Mills*, 916 F.2d 680, 16 U.S.P.Q.2d 1430

(Fed. Cir. 1993). The Examiner may not merely state that the modification would have been obvious to one of ordinary skill in the art without pointing out in the prior art a suggestion of the desirability of the proposed modification. The Examiner has failed to demonstrate any motivation or incentive in the prior art to combine and modify the references so as to achieve the claimed invention. The only motivation to even to attempt to combine *Humes* and *Walker* is to try to arrive at Applicant's claimed invention and thus, the alleged combination is a result of impermissible hindsight reconstruction using Applicant's own disclosure as an aide. While Applicant understands that all examination entails some measure of hindsight, when the rejection is based completely on hindsight, as in the present case, rather than only what is gleaned from the references by one of ordinary skill in the art, then the rejection is improper and should be withdrawn.

Moreover, neither *Humes* nor *Walker* teaches the problem of the present invention or its source. The present invention recognizes the problems involved with speed reading web pages. Thus, the present invention provides a method for receiving requests for modified content and modifying original content of a document without degrading readability of the document where the original content that is unmodified in the document retains its original physical and spatial characteristics after a part of the original content is modified to increase readability of the document and to increase the speed at which a user can read the modified document. Therefore, one of ordinary skill in the art would not be motivated to modify *Humes* and *Walker* in the manner required to form the solution discussed in the claimed invention when the problems addressed by the references are reviewed when considering each reference as a whole.

In view of the above, independent claims 1, 9, 20, 28, 35, and 36 are not taught or suggested by the alleged combination of *Humes* and *Walker* . Accordingly, Applicant respectfully requests withdrawal of the rejection of independent claims 1, 9, 20, 28, 35, and 36 under 35 U.S.C. §103.

Claims 2-8, 10-15, 21-27, and 29-34 are dependent claims depending on independent claims 1, 9, 20, and 28, respectively. Applicants have already demonstrated claims 1, 9, 20, 28, 35, and 36 to be in condition for allowance. Applicants respectfully submit that claims 2-8, 10-15, 21-27, and 29-34 are also allowable, at least by virtue of their dependency on allowable claims.

Thus, the rejection of claims 1-15 and 20-36 under 35 U.S.C. §103(a) has been overcome.

IV.   35 U.S.C. § 103, Obviousness

The Examiner has rejected claims 16-19 under 35 U.S.C. Section 103(a) as being anticipated by *Humes* (U.S. Patent No. 5,996,011) in view of *Berstis et al.* (U.S. Patent No. 6,510,458). This rejection is respectfully traversed.

With regard to claim 1 being anticipated by *Humes* in view of *Berstis*, the Examiner states:

> In regard to independent claim 16, Humes teaches *a method in a data processing system* (Humes Abstract Lines 1-3 i.e. system and method for restricting access to data received by a computer) *and a set of instructions* (Humes Col 5 Line 26 i.e. certain rules are met); *receive a request* (Humes Abstract Line 3 i.e. data received) *to alter original content of a web page*(Humes Col 5 Line 26*) and reduce the set of words in the web page*(Humes Col 6 Line 37 i.e. filtered text)(Humes Col 5 Line 26), *wherein the set of words is reduced* (Humes Col 6 Line 37 filtered text) *using a set of rules* (Humes Col 5 Line 26 i.e. certain rules are met), *and wherein the set of word in the modified webpage* (Hume Col 5 Line 26) *retains key words allowing identification of the content of the web page .*(Hume Col 5 Line 45 i.e. target word)
>
> Humes does not specifically mention *said document retaining its original physical and spatial characteristics after said content is modified, and displaying said document having said original physical and spatial characteristics.* However, Walker mentions a document having its original characteristics (Walker Col 3 Lines 15-21). It would have been obvious to one of ordinary skill in the art at the time the invention was made to apply Walker to Humes, providing Humes the benefit of displaying the document with its original characteristics to fit the users original display screen.
>
> Humes does not specifically teach of a bus system. However, Berstis *teaches a bus system* (Berstis Col 4 Line 40 i.e. system bus); *a communications adapter connected to the bus.* (Berstis Col 4 Line 52-53) *wherein the communications adapter provides for data transfer* (Berstis Col 6 Line 11) *to and from the data processing system; a memory* (Berstis Col 4 Line 40) *connected to the bus system* (Berstis Col 4 Line 52-53). It would have been obvious to one of ordinary skill in the art at the time the invention was made to apply Berstis to Humes, providing Humes the benefit of adding a bus system to will allow in the transfer of data to filter out certain content.

(*Office Action*, dated May 31, 2005, pages 10-11). Amended independent claim 16, reads as follows:

> 16. A data processing system comprising:
> a bus system;
> a communications adapter connected to the bus, wherein the communications adapter provides for data transfer to and from the data processing system;
> a memory connected to the bus system, wherein the memory includes a set of instructions; and
> a processor unit connected to the bus, wherein the processor unit executes the set of instructions to receive a request to alter original content of a web page and reduce the set of words in the web page, in response to each receipt of said request to make selected content of said original content invisible without degrading readability of said web page to form an altered web page, wherein unaltered content in said altered web page retaining its original physical and spatial characteristics after a portion of said original content is altered, wherein the set of words is reduced to increase readability of the web page using a set of rules, wherein the set of words in the web page being made invisible increases a speed at which a user can read the altered web page relative to a speed at which the user can read the web page without alterations, and wherein the set of words in the altered web page retains key words allowing identification of the content of the web page.

This rejected independent claim recites receiving a request to alter original content of a web page and reduce the set of words in the web page and altering original content of a web page without degrading readability of said web page. This claim also recites that the original content that is unaltered in the altered web page retains its original physical and spatial characteristics after the original content is altered to increase the speed at which a user can read the altered web page. Claim 16 recites "receive a request to alter original content of a web page and reduce the set of words in the web page . . . to make selected content of said original content invisible without degrading readability of said web page to form an altered web page; wherein unaltered content in said altered web page retaining its original physical and spatial characteristics after a portion of said content is altered . . . to increase a speed at which a user can read the altered web page." Receiving a request to alter original content of a web page and reduce the set of words in the web page and altering content of a web page without degrading readability of the web page where the content that is unaltered in the altered web page

retains its original physical and spatial characteristics after a portion of the original content is altered to increase the speed at which a user can read the altered web page are not features taught or suggested in *Humes, Walker, or Berstis.*

Applicants agree with the Examiner that *Humes* does not teach a bus system. The Examiner uses *Berstis* to supply this missing feature. The combination of *Humes* and *Berstis*, however, does not describe, teach, or suggest the features of Applicants' claims, not even with the addition of *Walker*.

As discussed in the Abstract, *Berstis* is directed towards preference parameters that filter web page contents from being stored in the cache. Cache filters take a variety of forms, such as ratings filters, web page identifier filters, and key word filters, which scan accessed contents of a web page for user selected terms. The filtered web page is then blocked from entry in the browser's cache based on the filtering process.

The Examiner further states that it would be obvious to combine *Humes* with *Berstis* to arrive at the features of the claimed invention. However, like *Walker*, *Berstis* does not cure the deficiencies in *Humes*. *Berstis* does not teach or suggest receiving a request to alter original content of a web page and reduce the set of words in the web page or altering content of a web page without degrading readability of the web page where the content that is unaltered in the altered web page retains its original physical and spatial characteristics after a portion of the original content is altered to increase the speed at which a user can read the altered web page, as recited in claim 16 of the present invention. As described above, neither *Humes* nor *Walker* teach these features. Therefore, the combination of *Humes, Walker* and *Berstis* not render claimed invention in claim 16 unpatentable because the combination does not describe, teach, or suggest receiving a request to alter original content of a web page and reduce the set of words in the web page or altering content of a web page without degrading readability of the web page where the content that is unaltered in the web page retains its original physical and spatial characteristics after a portion of the original content is altered to increase the speed at which a user can read the altered web page.

Even if *Humes* were combinable with *Berstis*, the result of such a combination would not be the invention as recited in independent claim 16. Rather, such an alleged combination would result in a system for filtering objectionable material in a web page,

as taught in *Humes*, with preference parameters filtering, in the manner described by *Berstis*. Even with the additions of *Humes* and *Walker*, there would be no receiving a request to alter original content of a web page and reduce the set of words in the web page nor altering content of a web page without degrading readability of the web page where the content that is unaltered in the web page retains its original physical and spatial characteristics after a portion of the original content is altered to increase the speed at which a user can read the altered web page, as recited in claim 16 of the present invention.

Furthermore, one of ordinary skill in the art would not combine *Humes* with *Berstis* when each reference is considered as a whole. In considering a reference as a whole, one of ordinary skill in the art would take into account the problems recognized and solved. As discussed above, *Humes* provides a method for filtering objectionable material in a web page, and when a user requests a web page with objectionable material, the user receives only a portion of a filtered web page with objectionable material, or no web page at all.

In contrast, according to the abstract, *Berstis* is directed towards preference parameters that filter web page contents from being stored in the cache. Cache filters take a variety of forms, such as ratings filters, web page identifier filters, and key word filters, which scan accessed contents of a web page for user selected terms. The filtered web page is then blocked from entry in the browser's cache based on the filtering process. In summary, *Berstis* provides preference parameters that filter web page contents from being stored in the cache.

In view of the above, there is no motivation to combine the teachings of *Humes* with *Berstis* in the manner alleged by the Examiner. The Examiner alleges that the motivation for the alleged combination is to provide "Humes the benefit of adding a bus system to will allow in the transfer of data to filter out certain content." However, there is no suggestion in *Humes* that there is a need for a bus system. In fact, *Humes* is directed toward a user receiving only a portion of a filtered web page with objectionable material, or no web page at all. Although the screens in *Humes* display documents, there is never any mention of a bus system.

Moreover, there is no suggestion in *Berstis* of a need to combine the preference parameters cache filtering approach of *Berstis* with the filtering objectionable text in a web page approach, such as that taught by *Humes*. *Humes* has nothing to do with cache filtering. There is no need, let alone any suggestion in *Berstis* for filtering objectionable text on a web page. Thus, the alleged motivation offered by the Examiner is not based on the actual teaching of the references.

As noted above, there is no teaching or suggestion in the references as to the desirability of including the features from other references. The mere fact that a prior art reference can be readily modified does not make the modification obvious unless the prior art suggested the desirability of the modification. *In re Laskowski*, 871 F.2d 115, 10 U.S.P.Q.2d 1397 (Fed. Cir. 1989) and also *see In re Fritch*, 972 F.2d 1260, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992) and *In re Mills*, 916 F.2d 680, 16 U.S.P.Q.2d 1430 (Fed. Cir. 1993). The Examiner may not merely state that the modification would have been obvious to one of ordinary skill in the art without pointing out in the prior art a suggestion of the desirability of the proposed modification. The Examiner has failed to demonstrate any motivation or incentive in the prior art to combine and modify the references so as to achieve the claimed invention. The only motivation to even to attempt to combine *Humes* and *Berstis* is to try to arrive at Applicant's claimed invention and thus, the alleged combination is a result of impermissible hindsight reconstruction using Applicant's own disclosure as an aide. While Applicant understands that all examination entails some measure of hindsight, when the rejection is based completely on hindsight, as in the present case, rather than only what is gleaned from the references by one of ordinary skill in the art, then the rejection is improper and should be withdrawn.

Moreover, neither *Humes*, nor *Walker*, nor *Berstis* teaches the problem of the present invention or its source. The present invention recognizes the problems involved with speed reading web pages. Thus, the present invention provides a method for receiving a request to alter original content of a web page and reduce the set of words in the web page and altering content of a web page without degrading readability of the web page where the content that is unaltered in the web page retains its original physical and spatial characteristics after a portion of the original content is altered to increase the speed at which a user an read an altered web page in combination with a bus system, a

communications adapter, a memory, and a processor unit connected to the bus. Therefore, one of ordinary skill in the art would not be motivated to modify *Humes* and *Berstis* in the manner required to form the solution discussed in the claimed invention when the problems addressed by the references are reviewed when considering each reference as a whole.

Therefore, one of ordinary skill in the art would not be motivated to modify *Humes* and *Berstis* in the manner required to form the solution discussed in the claimed invention when the problems addressed by the references are reviewed when considering each reference as a whole.

In view of the above, Applicant submits that independent claim 16 is not taught or suggested by the alleged combination of *Humes, Walker,* and *Berstis.* Accordingly, Applicant respectfully requests withdrawal of the rejection of independent claims 16 under 35 U.S.C. §103.

Claims 17-19 are dependent claims depending on independent claim 16. Applicants have already demonstrated claim 16 to be in condition for allowance. Applicants respectfully submit that claims 17-19 are also allowable, at least by virtue of their dependency on allowable claims.

Thus, the rejection of claims 16-19 under 35 U.S.C. §103(a) has been overcome.
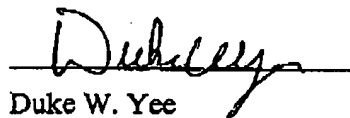
V. Conclusion

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

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